

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:	:	Chapter 11
	:	
LEHMAN BROTHERS HOLDINGS, INC., <i>et al.</i> ,	:	Case No. 08-13555 (JMP)
	:	
Debtors.	:	
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**NOTICE OF APPEARANCE AND
REQUEST FOR NOTICE AND SERVICE OF PAPERS**

PLEASE TAKE NOTICE that Neil S. Binder, a member of the law firm of Binder & Schwartz LLP who is admitted to practice before this Court, hereby enters his appearance in the above-captioned Chapter 11 case as counsel for BKM Holdings (Cayman) Ltd., Blue Angel Claims LLC, and Hightip Capital LLC, and hereby requests, pursuant to Rules 2002, 9007 and 9010 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Sections 102 and 1109 of the United States Bankruptcy Code (the “Bankruptcy Code”), that all notices or pleadings given or required to be given in connection with the above-captioned Chapter 11 case and any cases consolidated or administered herewith, and all papers served or required to be served in connection therewith, be given and served on the undersigned at the office address, telephone number and email address set forth below.

PLEASE TAKE FURTHER NOTICE that the foregoing request includes all of the notices, copies and papers referred to in the Bankruptcy Rules, Bankruptcy Code, and the Local Bankruptcy Rules for the Southern District of New York, and also includes, without limitation, notices of any orders, pleadings, motions, applications, complaints, demands, hearings, requests or petitions, answering or reply papers, memoranda and briefs in support of any of the foregoing and any other document brought before this Court with respect to any proceedings therein,

whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telecopier, telex or otherwise.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance and Request for Notice and Service of Papers, nor any later appearance, pleading, claim or suit shall constitute a waiver of (i) the right to have final orders in non-core matters entered only after *de novo* review by a judge of the United States District Court for the Southern District of New York, (ii) the right to trial by jury in any proceeding related to this proceeding, (iii) the right to have the United States District Court for the Southern District of New York withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) any objection to the jurisdiction of this Court for any purpose other than with respect to this notice, (v) an election of remedy, (vi) any other rights, claims, actions, defenses, setoffs, or recoupments as appropriate, in law or in equity, under any agreements, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: New York, New York.
May 1, 2015

BINDER & SCHWARTZ LLP

By: /s/ Neil S. Binder

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